

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:
Monroe Post Office
Monroe, Arkansas

Docket No. A2011-40

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(September 27, 2011)

On August 3, 2011, the Postal Regulatory Commission (Commission) received an appeal postmarked July 26, 2011, from postal customer Martha Pineda (Petitioner) objecting to the discontinuance of the Post Office at Monroe, Arkansas. On August 5, 2011, the Commission issued Order No. 794, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). In accordance with Order No. 794, the Postal Service filed the administrative record with the Commission on August 12, 2011. On September 12, 2011, the Public Representative filed Comments stating the "Commission should affirm the Postal Service's determination to close the Monroe, Arkansas, Post Office." Public Representative Comments at 3. The Commission received no additional written communications from customers of the Monroe Post Office. The Petitioner did not file a Form 61 Participation Statement in support of the petition.

The appeal received by the Commission on August 3, 2011 raises three main issues: (1) the effect on postal services, (2) the impact upon the Monroe community, and (3) the calculation of economic savings expected to result from discontinuing the Monroe Post Office. As reflected in the administrative record of this proceeding, the

Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,¹ the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Monroe Post Office should be affirmed.

Background

The Final Determination To Close the Monroe NC Post Office and Establish Service by Rural Route Service (FD), as well as the administrative record, indicate that the Monroe Post Office provided EAS-55 level service to 58 Post Office Box customers and retail customers 36 hours per week. FD at 1; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet ("Fact Sheet"), at 12.² The former postmaster of the Monroe Post Office retired on November 30, 2010. A noncareer employee was installed as the temporary officer-in-charge (OIC). The OIC resigned on August 4, 2011, and the Postal Service was unable to find a replacement. This resulted in the Postal Service suspending operations of the Monroe Post Office on August 5, 2011.³ The average number of daily retail window transactions at the Monroe Post Office was seven. Revenue has generally been low: \$10,414 in FY 2008 (27 revenue units); \$8,047 in FY 2009 (9 revenue units); and \$9,123 (21 revenue units) in FY 2010.⁴

¹ See 39 U.S.C. 404(d)(2)(A).

² In these comments, specific items in the administrative record are referred to as "Item ____."

³ FD, at 6; Item 33, Proposal to Close the Monroe, NC Post Office and Establish Service by Rural Route Service ("Proposal") at 1 and 4; Item 10, Post Office Survey Sheet at 1; Notice of Post Office Emergency Suspension at 1.

⁴ FD, at 1; Item 18, Fact Sheet; Item 33, Proposal, at 1.

The Monroe Post Office has no meter or permit customers. FD at 1; Item 33, Proposal, at 1.

Upon implementation of the emergency suspension and final determination, delivery and retail services will be provided by rural route delivery administered by the Brinkley Post Office, an EAS-18 level office located approximately fourteen miles away, which has 240 Post Office Boxes that are accessible twenty-four hours a day. FD at 1; Item 18 Fact Sheet; Item 33 Proposal, at 1. Only 58 of the 188 Post Office Boxes at the Monroe Post Office had been rented to customers. Item 15, Post Office Survey Sheet; FD at 1.

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the Monroe Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and FD, customers received notice through other means. Questionnaires were distributed to delivery customers of the Monroe Post Office. Questionnaires were also available over the counter for retail customers at Monroe. FD at 1; Item 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Monroe Post Office; Item 33, Proposal at 1. A letter from the Manager Consumer Affairs and Claims, Little Rock, AR was also made available to postal customers, which advised customers that the Postal Service was evaluating whether the continued operation of the Monroe Post Office was warranted, and that effective and regular service could be provided through rural route delivery and retail services available at the Brinkley Post Office. The letter invited customers to

complete and return a customer questionnaire and to express their opinions about the service they were receiving and the effects of providing postal services from the Brinkley Post Office. Item 21, Letter to Customers. The returned customer questionnaires appear in the Administrative Record in Item 22. In addition, representatives from the Postal Service were available at the Monroe County Line Church for a community meeting on March 31, 2011, to answer questions and provide information to customers. FD at 1; Item No. 21, Letter to Customer; Item No. 24, Community Meeting Roster; Item No. 33, Proposal, at 1. Customers received formal notice through postings at the affected Post Offices. The Proposal was posted with an invitation for public comment at the Monroe Post Office from April 8 through June 9, 2011. FD, at 1; Item No. 33, Proposal, showing round date-stamped cover sheet; Item 37, Notice of Taking Proposal and Comments Under Internal Consideration. The FD was posted starting on June 30, 2011, as confirmed by the round-dated FD cover sheet that appears in the administrative record.

In light of the postmaster vacancy, a minimal workload, low office revenue,⁵ the variety of delivery and retail options (including the convenience of rural delivery and retail service),⁶ minimal impact upon the community, and the expected financial savings,⁷ the Postal Service issued the FD.⁸ Regular and effective postal services will continue to be provided to the Monroe community in a cost-effective manner upon implementation of the final determination. FD at 1.

⁵ See note 4 and accompanying text,

⁶ FD, at 1-4; Item No. 33, Proposal, at 1-3.

⁷ FD, at 1-2, 4; Item 18, Fact Sheet; Item 23, Proposal Checklist, at 2; Item No. 33, Proposal, at 1-4.

⁸ FD, at 1-4.

Each of the issues raised by the Petitioner is addressed in the paragraphs which follow.

Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Monroe Post Office on postal services provided to Monroe customers. The closing is premised upon providing regular and effective postal services to Monroe customers.

The Petitioner, in her letter of appeal, states that the closing of the Post Office will devastate the community, questions Postal Service procedures, and requests the retention of the Monroe Post Office. During the community meeting and in response to questionnaires, customers raised the issue of the effect on postal services of the Monroe Post Office's closing, noting the convenience of the Monroe Post Office and requesting its retention. In particular customers expressed concerns about the security of the mail and the ability of the elderly and persons with disabilities to obtain postal services. Each of these concerns was considered by the Postal Service. Item 23, Postal Service Customer Questionnaire Analysis; FD at 1-3; Item 22, Postal Service Questionnaires; Item 38, Optional Comment Forms.

A questionnaire was sent to the Postal Inspection Service concerning mail theft and vandalism. Postal Inspection Service records indicate that there has not been any report of mail theft or vandalism in the area. Item 33, Proposal at 2; Item 14, Possible Discontinuance of PO. Customers may place a lock on their mailboxes. The mailbox must have a slot large enough to accommodate the customer's normal daily mail

volume. The Postal Service does not open mailboxes which are locked and does not accept keys for this purpose. FD at 3; Item 40, Analysis of 60-Day Posting Comments.

The Postal Service has considered the impact of closing the Monroe Post Office upon the provision of postal services to Monroe customers. Rural route delivery to mailboxes installed on the carrier's line of travel provides access to retail service that is similar to that in Post Offices, thereby alleviating the need to travel to the. FD at 2-3; Item 33, Proposal at 1-3. Most transactions do not require meeting the carrier at the mailbox. Stamps by mail and money order application forms are available for customer convenience. FD at 1. In addition, carrier service is beneficial to many senior citizens and customers with disabilities because the carrier can provide delivery and retail services to roadside mailboxes. Customers do not have to make a special trip to the Post Office for service. Special provisions can be made for hardship cases or special customer needs. To request an exception for hardship delivery, customers may contact the administrative postmaster for more information. FD at 1; Item 33, Proposal, at 1-4.

Upon implementation of the emergency suspension and final determination, services provided at the Post Office, such as the sale of stamps, envelopes, postal cards and money orders will also be available from the carrier to a roadside mailbox by rural route delivery emanating from the Brinkley Post Office. FD at 4; Item 33, Proposal at 3-4. Thus, the Postal Service has properly concluded that all Monroe customers will continue to receive regular and effective service via rural route delivery to mailboxes installed on the carrier's line of travel.

Effect Upon the Monroe Community

The Postal Service is obligated to consider the effect of its decision to close the Monroe Post Office upon the Monroe community. 39 U.S.C. § 404(d)(2)(A)(i). While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role in community affairs often played by local Post Offices, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Monroe is an unincorporated rural community located in Monroe County, Arkansas. Police and fire protection are provided by Monroe County and the community is administered politically by Monroe County. Item 33, Proposal at 3. The community is composed primarily of farmers, but also includes those who commute to work at nearby communities and work in local businesses. Item 33, Proposal at 3; FD at 5; Item 16, Community Survey Sheet at 1. Residents send their children to schools in Clarendon. Item 33, Proposal at 1; Item 16, Community Survey Sheet at 1. In general, community members must travel elsewhere for supplies and services. There is no grocery store in Monroe. Item 33, Proposal at 1, 3; Item 22, Postal Service Customer Questionnaires.; Item 18, Fact Sheet

The Petitioner, in her letter of appeal, states that the closing of the Post Office will devastate the community. In addition, the Postal Service received eight letters from Congressman Rick Crawford on behalf of constituents who had contacted his office expressing concerns that the closing of the Monroe Post Office will have a disparaging effect on the community. Item 28, Congressional Inquiries and Postal Service

Response Letters. The Petitioner's letter of appeal and the Congressional inquiries raise the issue of the effect of the closing of the Monroe Post Office upon the Monroe community. This issue was extensively considered by the Postal Service, as reflected in the administrative record. FD, at 1-2; Item 40, Analysis of 60-Day Posting Comments; Item 33, Proposal, at 1. The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name. Item 33, Proposal at 1-3; FD at 1-2. Communities generally require regular and effective postal services and these will continue to be provided to the Monroe community. The record makes clear that the Postal Service is addressing this concern about preservation of the community identity by continuing use of the Monroe name and ZIP Code in addresses. FD at 1-2; Item 33, Proposal at 1-2. In addition, the Postal Service has concluded that nonpostal services provided by the Monroe Post Office can be provided by the Brinkley Post Office. Government forms usually provided by the Post Office are also available by contacting local government agencies. Item 33, Proposal at 3.

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d)(2)(A)(i), by considering the effect of closing the Monroe Post Office on the community served by the Monroe Post Office.

Economic Savings

Postal officials also properly considered the economic savings that would result from the proposed closing, as provided under 39 U.S.C. § 404(d)(2)(A)(iv). The

estimated annual savings associated with discontinuing the Monroe Post Office are \$30,958. FD at 4; Item 33, Proposal, at 4.

Economic factors are one of several factors that the Postal Service considered, and economic savings have been calculated as required for discontinuance studies, which is noted throughout the administrative record, consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iv). FD, at 4; Item 33, Proposal, at 4.

The Postal Service determined that carrier service is more cost-effective than maintaining the Monroe postal facility and postmaster position. FD, at 4. The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service, therefore, has considered the economic savings to the Postal Service resulting from such a closing, consistent with its statutory obligations and Commission precedent. See 39 U.S.C. § 404(d)(2)(A)(iv).

Effect on Employees

As documented in the record, the impact on postal employees is minimal. The former postmaster retired on November 30, 2010. A noncareer employee was installed as the temporary officer-in-charge (OIC). The OIC resigned on August 4, 2011, which resulted in the Postal Service suspending operations of the Monroe Post Office on August 5, 2011. FD at 4; Notice of Post Office Emergency Suspension, at 1. The record shows that no other employee would be affected by this closing. FD, at 4; Item 15, Post Office Survey Sheet at 1; Item 33, Proposal, at 1, 4. Therefore, in making the determination, the Postal Service considered the effect of the closing on the employees

at the Monroe Post Office, consistent with its statutory obligations. See 39 U.S.C. § 404(d)(2)(A)(ii).

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Monroe Post Office on the provision of postal services and on the Monroe community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Monroe customers. FD, at 4. The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Monroe Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Monroe Post Office be affirmed.

Respectfully submitted,

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